

JAP:DG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

RAOUL STOFFEL,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

DANIEL DONAHUE, being duly sworn, deposes and states that he is a
Special Agent with the Department of Homeland Security, Homeland Security
Investigations, duly appointed according to law and acting as such.

On or about December 24, 2016, within the Eastern District of New York and
elsewhere, the defendant RAOUL STOFFEL did knowingly, intentionally and unlawfully
import into the United States from a place outside thereof, cocaine, a Schedule II controlled
substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are
as follows:¹

1. On or about December 24, 2016, the defendant RAOUL STOFFEL
arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard

¹ Because the purpose of this Complaint is to set forth only those facts necessary to
establish probable cause to arrest, I have not described all the relevant facts and
circumstances of which I am aware.

Caribbean Airlines Flight 524 from Port of Spain, Republic of Trinidad and Tobago. The defendant was travelling with his daughter, who is a minor.


2. Upon his arrival, the defendant RAOUL STOFFEL was selected for an enforcement examination by Customs and Border Protection (“CBP”) officers. The defendant presented two bags for inspection, the results of which were negative. During the examination, the defendant appeared nervous and provided inconsistent statements. A pat-down search was requested and approved, which also yielded negative results. The defendant continued to exhibit nervous behavior and ultimately stated that he had swallowed under twenty pellets containing narcotics.

3. The defendant RAOUL STOFFEL was then presented with an x-ray consent form, which he read, indicated that he understood, and signed. The defendant was then transported to the medical facility at JFK.

4. An x-ray was then taken of the defendant’s intestinal tract, which was positive for foreign bodies. The defendant subsequently passed eighteen pellets, one of which was probed and field-tested positive for the presence of cocaine. The defendant was placed under arrest. As of the date of this complaint, the defendant has passed at least 74 pellets.

5. The defendant RAOUL STOFFEL will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant RAOUL STOFFEL be dealt with according to law.



DANIEL DONAHUE
Special Agent
Homeland Security Investigations

Sworn to me before this
25th day of December, 2016

THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK